

STEPHANIE WADSWORTH)	
Individually and as Parent and Legal Guardian)	Case No. 2:23-cv-00118-NDF
of W.W., K.W., G.W., and L.W., minor children)	
and MATTHEW WADSWORTH,)	
)	DECLARATION OF
)	JARED B. GIROUX
Plaintiffs,)	IN SUPPORT OF MOTION TO
)	EXCLUDE TESTIMONY OF
v.)	RONALD SNYDER
)	
WALMART INC. and)	
JETSON ELECTRIC BIKES, LLC,)	
)	
Defendants.)	

I, Jared G. Giroux, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Falmouth, Maine.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on September 6, 2023.
3. This case involves a February 1, 2022 residential fire in Green River, Wyoming.
4. My partner, Eugene LaFlamme, attended the deposition of Dr. Ronald Snyder, taken on August 14, 2024.
5. Attached as Exhibit 1 are the pertinent portions of Plaintiffs' Initial Expert Witness Disclosures – Dr. Snyder's Report filed on July 15, 2024, Doc. 73-2.
6. Attached as Exhibit 2 are the pertinent portions of Dr. Ronald Snyder's deposition taken on August 14, 2024.
7. Attached as Exhibit 3 are the pertinent portions of Dr. Callie Thompson's deposition taken on October 15, 2024.
8. Attached as Exhibit 4 are the pertinent portions of Dr. Scott Sulentich's deposition taken on August 27, 2024.
9. Attached as Exhibit 5 are the pertinent portions of Plaintiff Stephanie Wadsworth's deposition taken on February 27, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 2, 2024



Jared B. Giroux